

Jennifer M. Kurtz
The Law Offices of Jennifer M. Kurtz, LLC
540 Old Bridge Turnpike
South River, NJ 08882
Tel: 732-390-5262
Fax: 732-390-2162
jennifer.kurtz@kurtz-law.com
Attorneys for Plaintiff,
Anthony Bilazzo

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

Anthony Bilazzo, :
Plaintiff, :
vs. : Civil Case No.: 11-CV-04517-NLH-KMW
Portfolio Recovery Associates, LLC, :
Defendant : **NOTICE OF ACCEPTANCE OF
DEFENDANT'S OFFER OF
JUDGMENT**
:

Plaintiff hereby accepts Defendant's Rule 68 Offer of Judgment served and filed herein in the above matter, and attached hereto as Exhibit A.

RESPECTFULLY SUBMITTED,

DATED: October 7, 2011

By:/s/ Jennifer M. Kurtz

Jennifer M. Kurtz
The Law Offices of Jennifer M. Kurtz, LLC
540 Old Bridge Turnpike
South River, NJ 08882
Tel: 732-390-5262
Fax: 732-390-2162
jennifer.kurtz@kurtz-law.com
Attorneys for Plaintiff,
Anthony Bilazzo

EXHIBIT A

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF
NEW JERSEY**

ANTHONY BILAZZO,

Plaintiff,

vs.

PORFOLIO RECOVERY
ASSOCIATES, LLC,

Defendant.

Hon.
Civil Action No.: 11-CV-04517-NLH-KMW

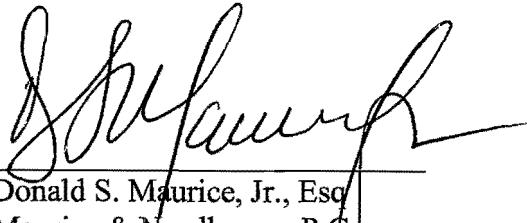
OFFER OF JUDGMENT

To: **ANTHONY BILAZZO**
c/o JENNIFER KURTZ, ESQ
540 OLD BRIDGE TURNPIKE
SOUTH RIVER, NJ 08882

PLEASE TAKE NOTICE that the Defendant, PORTFOLIO RECOVERY ASSOCIATES, LLC, pursuant to Federal Rules of Civil Procedure 68, hereby offers to allow judgment to be taken against it in the amount of \$1,001.00 (One Thousand and one Dollars and no cents), plus 1) your reasonable attorneys fees and costs, through the date of this Offer of Judgment, as may be determined by the Court; 2) your actual costs for the filing fee of your complaint in the U.S. District Court; and, 3) your actual costs for service of the summons and complaint upon the Defendant. This offer of judgment is inclusive of all damages, costs, and attorneys' fees as to all claims asserted by you against PORTFOLIO RECOVERY ASSOCIATES, LLC. This offer of judgment is not an admission of any fact or thing.

Pursuant to F.R.C.P. 68, please provide written notice of Plaintiff's acceptance of the within offer within fourteen (14) days of service of this offer. If this offer is not

accepted by written notice within fourteen (14) days of the date of service, it will be
deemed withdrawn.



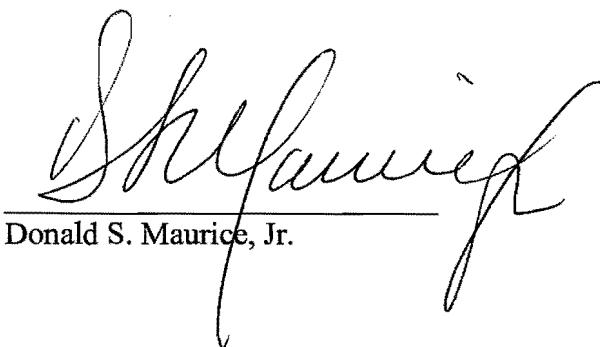
Donald S. Maurice, Jr., Esq.
Maurice & Needleman, P.C.
Attorneys for Defendant
Portfolio Recovery Associates, LLC
5 Walter E. Foran Blvd
Suite 2007
Flemington, NJ 08822
(908) 237-4550

Date: September 23, 2011

CERTIFICATE OF SERVICE

I hereby certify that a true and correct of the foregoing Offer of Judgment was served on this date via FedEx, addressed to the following:

JENNIFER KURTZ, ESQ.
540 OLD BRIDGE TURNPIKE
SOUTH RIVER, NJ 08882



Donald S. Maurice, Jr.

Dated: September 23, 2011

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on October 7, 2011, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record identified below via transmission of Notices of Electronic Filing generated by CM/ECF.

DONALD S. MAURICE , JR.
MAURICE & NEEDLEMAN, PC
5 WALTER E. FORAN BOULEVARD
SUITE 2007
FLEMINGTON, NJ 08822-4672
(908) 237-4570
Email: dsm@mnlawpc.com

RACHEL FRANCESCA MARIN
MAURICE & NEEDLEMAN PC
5 WALTER & FORAN BOULEVARD
SUITE 2007
FLEMINGTON, NJ 08822
908-905-5070
Email: rmarin@mnlawpc.com

By:/s/ Jennifer M. Kurtz

Jennifer M. Kurtz
The Law Offices of Jennifer M. Kurtz, LLC
540 Old Bridge Turnpike
South River, NJ 08882
Tel: 732-390-5262
Fax: 732-390-2162
jennifer.kurtz@kurtz-law.com
Attorneys for Plaintiff,
Anthony Bilazzo